

EXHIBIT B

David Barillari

From: Freeman, Clark A. <cfreeman@sandw.com>
Sent: Tuesday, May 29, 2018 6:35 PM
To: David Barillari; Sullivan, Michael
Cc: Byron Pacheco; Maria Guarisco
Subject: RE: Centauro v. Bazzoni, et al., 15-cv-9003: Outstanding Discovery

David,

We have considered the proposal below regarding Centauro's document requests and Elemento's objections. We appreciate Centauro's willingness to narrow the scope of the dispute as to those requests listed in subparagraph A below. As for those requests listed in subparagraph B below, Elemento continues to object to them as overbroad.

Thanks,

Clark

Clark A. Freeman
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From: David Barillari [mailto:DBarillari@BSFLLP.com]
Sent: Friday, May 25, 2018 12:31 PM
To: Freeman, Clark A.; Sullivan, Michael
Cc: Byron Pacheco; Maria Guarisco
Subject: RE: Centauro v. Bazzoni, et al., 15-cv-9003: Outstanding Discovery

Counsel,

I write to follow up on our conferral on May 24, 2018. As discussed, there are a number of document requests we have issued to which you objected, and to which we are amenable to limiting the date range to address your concerns. For other requests, however, a broader date range is necessary, given assertions Elemento-related witnesses have made on Elemento's behalf.

Please review our proposal below and let us know whether it addresses your concerns, or if you have additional questions.

- A. **Date Restricted Requests (Jan. 1, 2015, to Dec. 31, 2016)**
 - i Request Nos. 4-15, 21, 23, 36-37, 45-46, 50, 52
- B. **Broader Date Restrictions (Jan. 1, 2015, to Dec. 31, 2017)**

- i Requests that include Bazzoni's "continued involvement with Elemento." Decl. of Carlos Galindez ¶ 18 (Dec. 22, 2017). Requests Nos. 16-20, 22.
- i Requests that include Elemento Ltd.'s oil-related business. Elemento Ltd. has asserted that the "Malta oil trading business" was not intended to engage in the same business opportunities as CTCL or its "BVI" affiliates. Decl. of Eduardo Cisneros ¶ 6 (Dec. 21, 2017). Elemento Ltd. has also asserted that it was an "administrative error" that led Elemento Ltd. in 2017 to hold itself out as a CTCL affiliate. Decl. of Carlos Galindez ¶ 23 (Dec. 22, 2017). Requests Nos. 24-25, 28-29, 30, 34.

Best,
David

From: Freeman, Clark A. [<mailto:cfreeman@sandw.com>]
Sent: Wednesday, May 23, 2018 1:06 PM
To: David Barillari
Cc: Randall Jackson; Byron Pacheco; Maria Guarisco; Sullivan, Michael
Subject: RE: Centauro v. Bazzoni, et al., 15-cv-9003: Outstanding Discovery

Thank you. We will speak to you at 1.

Clark

From: David Barillari [<mailto:DBarillari@BSFLLP.com>]
Sent: Wednesday, May 23, 2018 1:02 PM
To: Freeman, Clark A.
Cc: Randall Jackson; Byron Pacheco; Maria Guarisco
Subject: RE: Centauro v. Bazzoni, et al., 15-cv-9003: Outstanding Discovery

We will circulate a meeting invite for 1pm tomorrow.

Best,
David

From: Freeman, Clark A. [<mailto:cfreeman@sandw.com>]
Sent: Wednesday, May 23, 2018 12:26 PM
To: David Barillari
Cc: Randall Jackson; Byron Pacheco; Maria Guarisco
Subject: RE: Centauro v. Bazzoni, et al., 15-cv-9003: Outstanding Discovery

Counsel,

We are free for a meet and confer at 1 pm or 2 pm tomorrow afternoon.

We will respond separately to your email of last night to address deposition dates.

Thank you,

Clark

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From: David Barillari [<mailto:DBarillari@BSFLLP.com>]
Sent: Wednesday, May 23, 2018 11:28 AM
To: Freeman, Clark A.
Cc: Randall Jackson; Byron Pacheco; Maria Guarisco
Subject: RE: Centauro v. Bazzoni, et al., 15-cv-9003: Outstanding Discovery

Counsel,

Further to the email below, I write regarding Defendant Elemento Ltd.'s Responses and Objections to Plaintiff's First Request for Production of Documents (the "R&Os"), sent on March 30, 2018.

In the R&Os, Elemento Ltd. objected to producing any documents responsive to requests for production 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 28, 29, 30, 34, 36, 37, 45, 46, 50, and 52. We disagree with Elemento Ltd.'s objections to these requests and maintain that those objections do not provide a sufficient basis for withholding all documents responsive to those requests.

We also note that Elemento Ltd. agreed to produce documents responsive to requests for production 26, 27, 31, 32, 35, 47, 51, and 53 but that no documents responsive to these requests appear to be in Elemento Ltd.'s production on May 8, 2018. Please confirm whether Elemento Ltd. plans to produce documents responsive to these requests or whether no such documents exist.

We suggest meeting and conferring to narrow the scope of our differences. As you know, the parties are required to update the Court on the status of discovery this Friday. If we are unable to resolve these objections, Centauro is prepared to move to compel.

Also, please let us know the status of the dates for the depositions we have noticed and requested, as that must also be included in our report to the Court on Friday.

Please let us know what times you are available.

Best,
David

From: Byron Pacheco
Sent: Wednesday, May 16, 2018 11:14 AM
To: Freeman, Clark A.; 'Matthew DeOreo'
Cc: David Barillari
Subject: Centauro v. Bazzoni, et al., 15-cv-9003: Outstanding Discovery

Counsel,

As you know, the deadline for discovery is this Thursday, May 17, 2018. Today Centauro will be making a supplemental production of documents responsive to Defendants' document requests. However, in light of

other outstanding discovery items, we will likely need to request another extension of the schedule from the Magistrate Judge.

Please confirm when you expect the below items to be fulfilled. And please confirm whether you would be willing to stipulate to a 30-day extension of the discovery deadline.

Defendant Bazzoni

On April 6, 2018, counsel circulated the Response of Defendant Alessandro Bazzoni to the Second Set of Document Demands Served by Plaintiff, in which Bazzoni agreed to produce non-privileged documents responsive to requests for production 1, 2, 3, 5, 21, 34, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 64, and 66. Please let us know the status of your production.

Defendant CT Energia Ltd. ("CTEL")

On April 6, 2018, counsel circulated the Response of Defendant CTCL to the Second Set of Document Demands Served by Plaintiff. For each request, CTCL stated that it "is not in possession, custody, or control of any documents that are reasonably responsive to this Request." As required by FRCP Rule 34(b)(2), please state with specificity the grounds for this objection, and whether any responsive documents are being withheld on the basis of this objection.

Defendant Elemento

On March 30, 2018, counsel circulated Defendant Elemento Ltd.'s Responses and Objections to Plaintiff's First Request for Production of Documents, in which Elemento agreed to produce non-privileged documents responsive to requests for production 1, 2, 3, 5, 26, 27, 31, 32, 33, 35, 38, 39, 40, 41, 42, 43, 44, 47, 48, 49, 51, 53, and 54. Centauro received a production of documents from Elemento on May 8, 2018. Please confirm whether this is the entirety of Elemento's production, or if there are additional documents responsive to these requests that you intend to produce. Also, please confirm whether you are withholding as privileged any responsive documents.

On May 1, 2018, we held a meet-and-confer call during which Mr. Freeman stated that counsel would provide an update on the availability for depositions of Carlos Galindez, Liana Galanti, E. Cisneros, R. Cisneros, Joan Jensen, and Elemento's 30(b)(6) witness (if different from the foregoing individuals). Please confirm their availability as soon as possible.

If all parties are in agreement regarding the extension, I will draft and circulate a letter to Judge Netburn today for your review. Please advise.

Regards,

Byron Pacheco, Esq.

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